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**From:** King, Scott@ARB [scott.king@arb.ca.gov]  
**Sent:** 5/14/2019 9:47:36 PM  
**To:** Kelly, ThomasP [Kelly.ThomasP@epa.gov]  
**CC:** Sutkus, Carol@ARB [carol.sutkus@arb.ca.gov]  
**Subject:** RE: RACM Analysis for West Mojave Desert Stationary Sources  
**Attachments:** ATT00001.txt

Hi Tom,

It has been a while since we talked. I looked into the Mojave racm demo and their contingency measures and feel ready to discuss these with you and the districts. Please include myself and Carol on the call.

Thanks, Scott



Scott King, Ph.D.  
California Air Resources Board  
1001 I street  
Sacramento, CA 95812  
(916) 322-2832

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**From:** Kelly, ThomasP <Kelly.ThomasP@epa.gov>  
**Sent:** Monday, May 13, 2019 10:42 AM  
**To:** King, Scott@ARB <scott.king@arb.ca.gov>  
**Subject:** FW: RACM Analysis for West Mojave Desert Stationary Sources

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Carol Sutkus let me know I should work with you on a couple of issues with West Mojave Desert's attainment plan for the 2008 ozone NAAQS. One issue is the District's reasonably available control measure (RACM) analysis for District-controlled sources. I explain that further in the message below and gave Ventura as an example of how this could be done. The second issue I would like to cover with the District, and you, is contingency measures. We're speaking with all the districts about this.

I will let you have a little time to review this, then send you and Alan DeSalvio an email with possible time for a conference call in a few days. If you have any concerns or think I should go ahead a schedule a call, please contact me. Thanks.

Tom Kelly  
Air Planning Office (AIR-2)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

(415) 972-3856

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**From:** Kelly, ThomasP  
**Sent:** Monday, March 18, 2019 4:04 PM  
**To:** Sutkus, Carol@ARB <[carol.sutkus@arb.ca.gov](mailto:carol.sutkus@arb.ca.gov)>  
**Cc:** Lee, Anita <[Lee.Anita@epa.gov](mailto:Lee.Anita@epa.gov)>  
**Subject:** RACM Analysis for West Mojave Desert Stationary Sources

I reviewed Appendix D-3, as you suggested. For stationary sources, It is essentially as statement that the Districts have determined they can't advance attainment by a year, without an explanation of the analysis that was completed. I have attached a discussion and analysis from the Ventura County ozone plan. Their analysis considered several specific rule revisions to support their determination -- that revising their rules could further reduce NOx by 0.08 tons per year and VOC by 0.25 tons per year. Such small reductions, however, would not advance attainment by a year (i.e. the RACM requirement). I am not certain Ventura's analysis even needed to consider Transportation Control Measures, because VCAQMD may not have the authority to implement or require them. You'll see a similar analysis in the ozone plans for South Coast, in Appendix VI-A (<https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-vi.pdf?sfvrsn=4>) and Sacramento, in Appendix E (the entire plan is at <http://www.airquality.org/ProgramCoordination/Documents/Sac%20Regional%202008%20NAAQS%20Attainment%20and%20RFP%20Plan.pdf>).

I am still interested in having a call with you and the District about RACM for their rules. If you still feel that Appendix D-3 is sufficient to meet the requirement, please let me know.

Tom Kelly  
Air Planning Office (AIR-2)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

(415) 972-3856